

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| | | |
|---------------------------------|----------|-------------------------------------------------|
| UNITED STATES OF AMERICA | : | CRIMINAL NO. _____ |
| v. | : | DATE FILED: _____ |
| ARTHUR FRAZIER | : | VIOLATIONS: |
| BALLANTINE RODRIGUEZ | : | 18 U.S.C. § 371 (conspiracy - 1 count) |
| WILFREDO UBARRY | : | 18 U.S.C. § 471 (manufacturing |
| PEDRO VAZQUEZ | : | counterfeit currency - 2 counts) |
| LISA VAZQUEZ | : | 18 U.S.C. § 473 (dealing in counterfeit |
| | : | currency - 2 counts) |
| | : | 18 U.S.C. § 472 (uttering and possessing |
| | : | counterfeit currency - 2 counts) |
| | : | 18 U.S.C. § 2 (aiding and abetting) |

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Defendant ARTHUR FRAZIER was the brother-in-law of defendant BALLANTINE RODRIGUEZ.
2. Defendants ARTHUR FRAZIER and BALLANTINE RODRIGUEZ were the uncles of defendant WILFREDO UBARRY.
3. Defendant WILFREDO UBARRY was a friend of defendant PEDRO VAZQUEZ.
4. Defendant PEDRO VAZQUEZ was the husband of defendant LISA VAZQUEZ.
5. Defendant LISA VAZQUEZ was a manager at an Old Navy clothing store

located in Philadelphia, Pennsylvania (“Old Navy”).

6. From in or around September 2004, to in or around November 2004, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ARTHUR FRAZIER,
BALLANTINE RODRIGUEZ,
WILFREDO UBARRY,
PEDRO VAZQUEZ, and
LISA VAZQUEZ**

conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, with intent to defraud, to pass, utter, and possess falsely made, forged, counterfeited, and altered obligations and other securities of the United States, in violation of Title 18, United States Code, Section 472.

MANNER AND MEANS

7. It was part of the conspiracy that defendant ARTHUR FRAZIER manufactured counterfeit United States currency, and the defendants conspired and agreed to possess that counterfeit currency and then exchange it for approximately \$15,300 in legitimate currency.

It was further a part of the conspiracy that:

8. Defendant ARTHUR FRAZIER passed the counterfeit currency he manufactured to defendant BALLANTINE RODRIGUEZ.

9. Defendant BALLANTINE RODRIGUEZ passed the counterfeit currency to defendant WILFREDO UBARRY.

10. Defendant WILFREDO UBARRY passed the counterfeit currency to defendant PEDRO VAZQUEZ.

11. Defendant PEDRO VAZQUEZ passed the counterfeit currency to defendant LISA VAZQUEZ.

12. Defendant LISA VAZQUEZ, while working at Old Navy, exchanged the counterfeit currency defendant ARTHUR FRAZIER had manufactured for legitimate United States currency belonging to Old Navy.

13. The defendants split the approximately \$15,300 in proceeds from their criminal acts.

OVERT ACTS

In furtherance of the conspiracy, defendants ARTHUR FRAZIER, BALLANTINE RODRIGUEZ, WILFREDO UBARRY, PEDRO VAZQUEZ, and LISA VAZQUEZ, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. In or around September or October 2004, defendant ARTHUR FRAZIER used electronic equipment located in his home in West Virginia to manufacture counterfeit United States currency.

2. In or around September or October 2004, defendant ARTHUR FRAZIER showed a few counterfeit bills he had manufactured to defendant BALLANTINE RODRIGUEZ and asked defendant RODRIGUEZ if he knew anyone who could exchange them for legitimate currency.

3. In or around September or October 2004, defendant BALLANTINE RODRIGUEZ asked defendant WILFREDO UBARRY if he or anyone he knew could exchange counterfeit currency for legitimate currency.

4. In or around October 2004, defendant WILFREDO UBARRY asked defendant PEDRO VAZQUEZ if he or anyone he knew could exchange counterfeit currency for legitimate currency. They agreed to ask for samples of the counterfeit currency.

5. In or around October 2004, defendant WILFREDO UBARRY asked defendant BALLANTINE RODRIGUEZ if defendant RODRIGUEZ could obtain samples of the counterfeit currency.

6. In or around October 2004, defendant BALLANTINE RODRIGUEZ asked defendant ARTHUR FRAZIER for samples of the counterfeit currency. Defendant FRAZIER agreed to provide the samples.

7. In or around October 2004, defendant ARTHUR FRAZIER provided defendant BALLANTINE RODRIGUEZ with \$300 in counterfeit currency, consisting of two \$100 bills and two \$50 bills.

8. In or around October 2004, defendant BALLANTINE RODRIGUEZ provided defendant WILFREDO UBARRY with the \$300 in counterfeit currency.

9. In or around October 2004, defendant WILFREDO UBARRY showed defendant PEDRO VAZQUEZ the sample \$300 in counterfeit currency.

10. In or around November 2004, defendant WILFREDO UBARRY provided the sample \$300 counterfeit currency to defendant PEDRO VAZQUEZ.

11. In or around November 2004, defendant PEDRO VAZQUEZ told defendant WILFREDO UBARRY that he or someone he knew could exchange counterfeit currency for legitimate currency, and defendant VAZQUEZ requested \$15,000 more in counterfeit currency.

12. In or around November 2004, defendant WILFREDO UBARRY told defendant BALLANTINE RODRIGUEZ that he knew someone who could exchange the counterfeit currency and requested a total of \$15,000 in counterfeit currency.

13. In or around November 2004, defendant BALLANTINE RODRIGUEZ asked defendant ARTHUR FRAZIER for a total of \$15,000 counterfeit currency. Defendant FRAZIER agreed to provide the counterfeit currency.

14. In or around November 2004, defendant ARTHUR FRAZIER used electronic equipment located in his home in West Virginia to manufacture approximately \$15,000 in counterfeit currency.

15. On or about November 23, 2004, defendant LISA VAZQUEZ exchanged the sample \$300 counterfeit currency for \$300 legitimate currency belonging to Old Navy.

16. On or about November 24, 2004, defendant ARTHUR FRAZIER provided approximately \$15,000 in counterfeit currency to defendant BALLANTINE RODRIGUEZ.

17. On or about November 25, 2004, defendant BALLANTINE RODRIGUEZ provided the approximately \$15,000 in counterfeit currency that was manufactured by defendant ARTHUR FRAZIER to defendant WILFREDO UBARRY.

18. On or about November 25, 2004, defendant WILFREDO UBARRY provided the approximately \$15,000 in counterfeit currency that was manufactured by defendant ARTHUR FRAZIER to defendant PEDRO VAZQUEZ.

19. On or about November 25, 2004, defendant PEDRO VAZQUEZ provided the approximately \$15,000 in counterfeit currency that was manufactured by defendant ARTHUR FRAZIER to defendant LISA VAZQUEZ.

20. On or about November 26, 2004, while she was working at Old Navy, defendant LISA VAZQUEZ secretly exchanged the approximately \$15,000 in counterfeit currency that was manufactured by defendant ARTHUR FRAZIER for legitimate currency belonging to Old Navy.

21. On or about November 26, 2004, defendants PEDRO VAZQUEZ and LISA VAZQUEZ gave defendant WILFREDO UBARRY his portion of the proceeds from exchanging the approximately \$15,000 in counterfeit currency that was manufactured by defendant ARTHUR FRAZIER, as well as the portion of the proceeds for defendants BALLANTINE RODRIGUEZ and ARTHUR FRAZIER.

22. On or about November 27, 2004, defendant WILFREDO UBARRY provided to defendant BALLANTINE RODRIGUEZ defendant RODRIGUEZ's portion of the proceeds and defendant ARTHUR FRAZIER's portion of the proceeds from the approximately \$15,000 in counterfeit currency.

23. On or about November 27, 2004, defendant BALLANTINE RODRIGUEZ wired to defendant ARTHUR FRAZIER via Western Union defendant FRAZIER's portion of the proceeds from the approximately \$15,000 in counterfeit currency.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

In or around October 2004, in Martinsburg, West Virginia, in the Northern District of West Virginia, defendant

ARTHUR FRAZIER,

with intent to defraud, falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$200 in counterfeit \$100 Federal Reserve Notes and approximately \$100 in counterfeit \$50 Federal Reserve Notes.

In violation of Title 18, United States Code, Section 471.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

From in or around October 2004, to in or around November 2004, in Pennsauken, New Jersey, in the District of New Jersey, and elsewhere, defendants

**ARTHUR FRAZIER,
BALLANTINE RODRIGUEZ,
WILFREDO UBARRY, and
PEDRO VAZQUEZ**

knowingly sold, transferred, and delivered, and aided and abetted the sale, transfer, and delivery of, counterfeit obligations of the United States, that is, approximately \$200 in counterfeit \$100 Federal Reserve Notes and approximately \$100 in counterfeit \$50 Federal Reserve Notes, with the intent that the counterfeit Federal Reserve Notes be passed, published, and used as true and genuine.

In violation of Title 18, United States Code, Sections 473 and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

In or around November 2004, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ARTHUR FRAZIER,
BALLANTINE RODRIGUEZ,
WILFREDO UBARRY,
PEDRO VAZQUEZ, and
LISA VAZQUEZ,**

with intent to defraud, passed, uttered, and possessed, and aided and abetted the passing, uttering, and possession of, falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$200 in counterfeit \$100 Federal Reserve Notes and approximately \$100 in counterfeit \$50 Federal Reserve Notes.

In violation of Title 18, United States Code, Sections 472 and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

In or around November 2004, in Martinsburg, West Virginia, in the Northern District of West Virginia, defendant

ARTHUR FRAZIER,

with intent to defraud, falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$9,300 in counterfeit \$100 Federal Reserve Notes, \$5,050 in counterfeit \$50 Federal Reserve Notes, and \$620 in counterfeit \$20 Federal Reserve Notes.

In violation of Title 18, United States Code, Section 471.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

In or around November 2004, in Pennsauken, New Jersey, in the District of New Jersey, and elsewhere, defendants

**ARTHUR FRAZIER,
BALLANTINE RODRIGUEZ,
WILFREDO UBARRY, and
PEDRO VAZQUEZ**

knowingly sold, transferred, and delivered, and aided and abetted the sale, transfer, and delivery of, counterfeit obligations of the United States, that is, approximately \$9,300 in counterfeit \$100 Federal Reserve Notes, \$5,050 in counterfeit \$50 Federal Reserve Notes, and \$620 in counterfeit \$20 Federal Reserve Notes, with the intent that the counterfeit Federal Reserve Notes be passed, published, and used as true and genuine.

In violation of Title 18, United States Code, Sections 473 and 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

In or around November 2004, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ARTHUR FRAZIER,
BALLANTINE RODRIGUEZ,
WILFREDO UBARRY,
PEDRO VAZQUEZ, and
LISA VAZQUEZ,**

with intent to defraud, passed, uttered, and possessed, and aided and abetted the passing, uttering, and possession of, falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$9,300 in counterfeit \$100 Federal Reserve Notes, \$5,050 in counterfeit \$50 Federal Reserve Notes, and \$620 in counterfeit \$20 Federal Reserve Notes.

In violation of Title 18, United States Code, Sections 472 and 2.

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**